

**IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF MISSOURI  
SOUTHEASTERN DIVISION**

THE STATE OF MISSOURI,  
ex rel. ANDREW T. BAILEY, in his official  
capacity as Missouri Attorney General,

Plaintiff,

v.

THE PEOPLE’S REPUBLIC OF CHINA,  
THE COMMUNIST PARTY OF CHINA,  
NATIONAL HEALTH COMMISSION  
OF THE PEOPLE’S REPUBLIC OF  
CHINA, MINISTRY OF EMERGENCY  
MANAGEMENT OF THE PEOPLE’S  
REUBLIC OF CHINA, MINISTRY OF  
CIVIL AFFAIRS OF THE PEOPLE’S  
REPUBLIC OF CHINA, PEOPLE’S  
GOVERNMENT OF HUBEI  
PROVINCE, PEOPLE’S GOVERNMENT  
OF WUHAN CITY, WUHAN INSTITUTE  
OF VIROLOGY, and CHINESE  
ACADEMY OF SCIENCES,

Defendants.

Case No. 1:20-cv-00099-SNLJ

**AFFIDAVIT OF SAMUEL C. FREEDLUND AND PLAINTIFF’S TRIAL EXHIBITS**

I, Samuel C. Freedlund, having personal knowledge and being duly sworn attest that:

1. I am over 18 years of age and am an attorney at the Office of the Attorney General for the State of Missouri. I represent the Plaintiff in this case.

2. Attached to this affidavit, as Exhibit 1, is a true and accurate copy of an expert report titled “The Economic Impact of the COVID-19 Pandemic: Quantifying the Damages to the Missouri Economy” prepared by Joseph H. Haslag, PhD. Professor Haslag is currently the Kenneth Lay Chair in Economics for the University of Missouri, and has been retained by Plaintiff as an expert in this case.

3. Attached to this affidavit, as Exhibit 2, is a true and accurate copy of a redacted government report prepared by the United States Department of Homeland Security Intelligence Enterprise Economic Security Mission Center titled “New Analytic Technique Indicates China Likely Hid Severity of COVID-19 from the International Community While it Stockpiled Medical Supplies.” The document is currently publicly available at [https://www.dhs.gov/sites/default/files/publications/china\\_and\\_covid-19.pdf](https://www.dhs.gov/sites/default/files/publications/china_and_covid-19.pdf)

4. Attached to this affidavit, as Exhibit 3, is a true and accurate copy of a government fact sheet prepared by the United States Department of State “Fact Sheet: Activity at the Wuhan Institute of Virology.” The document is currently publicly available at <https://2017-2021.state.gov/fact-sheet-activity-at-the-wuhan-institute-of-virology/>.

5. Attached to this affidavit, as Exhibit 4, is a true and accurate copy of a government report published by the Office of the Director of National Intelligence. The document is currently publicly available at <https://www.odni.gov/files/ODNI/documents/assessments/Unclassified-Summary-of-Assessment-on-COVID-19-Origins.pdf>

6. Attached to this affidavit, as Exhibit 5, is a true and accurate copy of a redacted government document published by the United States Department of State titled “[REDACTED] Says PRC Central Government -- Not Local Officials -- Responsible for the Coronavirus Cover-Up.” The document is currently publicly available at <https://oversight.house.gov/wp-content/uploads/2024/05/FL-2022-00075-April-2023-Production-ccp.pdf>

7. Attached to this affidavit, as Exhibit 6, is a true and accurate copy of a government report prepared by the Office of Senator Marco Rubio titled “‘A Complex and Grave Situation’: A Political Chronology of the SARS-COV-2 Outbreak.” The document is currently publicly available at [https://www.rubio.senate.gov/wp-content/uploads/\\_cache/files/4f6bb786-504e-443d-](https://www.rubio.senate.gov/wp-content/uploads/_cache/files/4f6bb786-504e-443d-)

8904-974dafc1cd0e/CD3BC3317D197A25E9FF01EBFB869357.rubio-covid-origins-report-final.pdf

8. Attached to this affidavit, as Exhibit 7, is a true and accurate copy of a government report prepared by the Congressional Research Service titled “COVID-19: China Medical Supply Chains and Broader Trade Issues.” The document is currently publicly available at <https://sgp.fas.org/crs/row/R46304.pdf>.

9. Attached to this affidavit, as Exhibit 8, is a true and accurate copy of a government report prepared by the Congressional Research Service titled “COVID-19 and Domestic PPE Production and Distribution: Issues and Policy Options.” The document is currently publicly available at <https://crsreports.congress.gov/product/pdf/R/R46628>.

10. Attached to this affidavit, as Exhibit 9, is a true and accurate copy of a government report prepared by the United States House of Representatives Foreign Affairs Committee Minority Staff titled “The Origins of the COVID-19 Global Pandemic, Including the Roles of the Chinese Communist Party and the World Health Organization.” This document is currently publicly available at <https://foreignaffairs.house.gov/wp-content/uploads/2020/09/Final-Minority-Report-on-the-Origins-of-the-COVID-19-Global-Pandemic-Including-the-Roles-of-the-CCP-and-WHO-9.20.20-Coverpage.pdf>.

11. Attached to this affidavit, as Exhibit 10, is a true and accurate copy of a government report prepared by the United States House of Representatives Foreign Affairs Committee Minority Staff titled “The Origins of COVID-19: An Investigation of the Wuhan Institute of Virology.” The document is currently publicly available at <https://foreignaffairs.house.gov/wp-content/uploads/2021/08/ORIGINS-OF-COVID-19-REPORT.pdf>



12. Attached to this affidavit, as Exhibit 11, is a true and accurate redacted copy of a government report prepared by the United States Department of State titled “China Opens First Bio Safety Level 4 Laboratory.”

13. Attached to this affidavit, as Exhibit 12, is a true and accurate copy of a press release prepared by the United States Centers for Disease Control and Prevention titled “First Travel-related Case of the 2019 Novel Coronavirus Detected in United States.” The document is currently publicly available at [https://archive.cdc.gov/www\\_cdc\\_gov/media/releases/2020/p0121-novel-coronavirus-travel-case.html](https://archive.cdc.gov/www_cdc_gov/media/releases/2020/p0121-novel-coronavirus-travel-case.html).

14. Attached to this affidavit, as Exhibit 13, is a true and accurate copy of a report prepared by the World Health Organization titled “WHO Guidance for the Use of Annex 2 of the International Health Regulations (2005).” The document is currently publicly available at [https://cdn.who.int/media/docs/default-source/documents/emergencies/who-guidance-for-use-of-annex-20b384e1a-1699-4794-a4d0-7c7b806cb31f.pdf?sfvrsn=1ae61836\\_3&download=true](https://cdn.who.int/media/docs/default-source/documents/emergencies/who-guidance-for-use-of-annex-20b384e1a-1699-4794-a4d0-7c7b806cb31f.pdf?sfvrsn=1ae61836_3&download=true)

15. Attached to this affidavit, as Exhibit 14, is a true and accurate copy of a report prepared by the Missouri Department of Health and Senior Services, Bureau of Health Care Analysis and Data Dissemination titled “Missouri COVID-19 Mortality 2020–2022.” The document is currently publicly available at <https://health.mo.gov/data/pdf/20202022-covid-deaths.pdf>

16. Attached to this affidavit, as Exhibit 15, is an aggregation of publicly reported data published by the State of Missouri detailing the State of Missouri’s published COVID-19 Expenditures between April 22, 2020 and December 31, 2020. The data is regularly published by the State of Missouri publicly, and may be accessed at <https://mapyourtaxes.mo.gov/MAP/Covid19/Expenditures/Agency/ExpendituresByAgency.aspx>.

17. Attached to this affidavit, as Exhibit 16, is a true and accurate copy of a press release prepared by the Office of the Governor of the State of Missouri titled “Governor Parson Announces Deployment of Decontamination System in Missouri to Assist with N95 Mask Shortage.” The document is currently publicly available at <https://governor.mo.gov/press-releases/archive/governor-parson-announces-deployment-decontamination-system-missouri-assist>.

18. Attached to this affidavit, as Exhibit 17, is a true and accurate copy of a press release of prepared remarks produced by the Office of the Governor of the State of Missouri titled “COVID-19 BRIEFING APRIL 10, 2020.” The document is currently publicly available at [https://content.govdelivery.com/attachments/MOGOV/2020/04/10/file\\_attachments/1424798/4-10-2020%20BRIEFING.pdf](https://content.govdelivery.com/attachments/MOGOV/2020/04/10/file_attachments/1424798/4-10-2020%20BRIEFING.pdf)

19. Attached to this affidavit, as Exhibit 18, is a true and accurate copy of a press release prepared by the Office of the Governor of the State of Missouri titled “Governor Parson Announces \$50 Million in New Grant Programs for Missouri Businesses.” The document is currently publicly available at <https://governor.mo.gov/press-releases/archive/governor-parson-announces-50-million-new-grant-programs-missouri-businesses>.

20. Attached to this affidavit, as Exhibit 19, is a true and accurate copy of a government report prepared by the Missouri Department of Health & Senior Services titled “Missouri Interim Guidance on Crisis Capacity Strategies for Personal Protective Equipment for Employees Working With Patients/Clients in Congregate Living Environments or In One-on-One or Small Group Settings.” This document is currently publicly available at <https://health.mo.gov/living/healthcondiseases/communicable/novel-coronavirus/pdf/ppe-usage.pdf>

21. Attached to this affidavit, as Exhibit 20, is a true and accurate copy of a government report prepared by the Missouri Department of Health & Senior Services titled “DHSS Interim Recommendations for PPE Sterilization, Re-use and Extended Use.” This document is currently publicly available at <https://dmh.mo.gov/media/pdf/dhss-interim-recommendations-ppe-sterilization-re-use-and-extended-use>.

22. Attached to this affidavit, as Exhibit 21, is a true and accurate copy of a government press release prepared by the Missouri Department of Economic Development titled “Get Involved: How You Can Help with COVID-19.” This document is currently publicly available at <https://web.archive.org/web/20200712004753/https://ded.mo.gov/howtohelp>.

23. Attached to this affidavit, as Exhibit 22, is a true and accurate copy of an article published in the Journal of Infection Control & Hospital Epidemiology titled “Cost of personal protective equipment during the first wave of the coronavirus disease 2019 (COVID-19) pandemic.” This document is currently publicly available at <https://www.cambridge.org/core/services/aop-cambridge-core/content/view/F7502E36D8D1785DE772317D11B60966/S0899823X23001150a.pdf/cost-of-personal-protective-equipment-during-the-first-wave-of-the-coronavirus-disease-2019-covid-19-pandemic.pdf>

24. Attached to this affidavit, as Exhibit 23, is a true and accurate copy of an article published in the Journal of Preventative Medicine titled “Contributing Factors to Personal Protective Equipment Shortages during the COVID-19 Pandemic.” This document is currently publicly available at <https://pmc.ncbi.nlm.nih.gov/articles/PMC7531934/pdf/main.pdf>.

25. Attached to this affidavit, as Exhibit 24, is a true and accurate copy of a report published by The Heritage Foundation’s Non-Partisan Commission on China and COVID-19,

titled “Holding China Accountable for its Role in the Most Catastrophic Pandemic of Our Time: COVID-19.” This document is currently publicly available at [https://www.heritage.org/sites/default/files/2024-07/SR286\\_1.pdf](https://www.heritage.org/sites/default/files/2024-07/SR286_1.pdf).

26. Attached to this affidavit, as Exhibit 25, is a true and accurate copy of a report published by DRASTIC Research Group titled “An investigation into the WIV databases that were taken offline.” This document is currently publicly available at [https://www.researchgate.net/publication/349073738\\_An\\_investigation\\_into\\_the\\_WIV\\_databases\\_that\\_were\\_taken\\_offline](https://www.researchgate.net/publication/349073738_An_investigation_into_the_WIV_databases_that_were_taken_offline).

27. Attached to this affidavit, as Exhibit 26, is a true and accurate copy of a report published by The Society for Healthcare Organization Procurement Professionals. This document is currently publicly available at [https://cdn.cnn.com/cnn/2020/images/04/16/shopp.covid.ppd.costs.analysis\\_.pdf](https://cdn.cnn.com/cnn/2020/images/04/16/shopp.covid.ppd.costs.analysis_.pdf).

28. Attached to this affidavit, as Exhibit 27, is a true and accurate copy of an article published in the Asian Economic Policy Review Journal titled “How COVID-19 Medical Supply Shortages Led to Extraordinary Trade and Industrial Policy.”

29. Attached to this affidavit, as Exhibit 28, is a true and accurate copy of an article published in the Bioethics Forum Essay titled “Chinese Bioethicists: Silencing Doctor Impeded Early Control of Coronavirus.” This document is currently publicly available at <https://web.archive.org/web/20220121063244/https://www.thehastingscenter.org/coronavirus-doctor-whistleblower/>.

30. Attached to this affidavit, as Exhibit 29, is a true and accurate copy of an article published in the New York Times titled “The World Needs Masks. China Makes Them, but Has Been Hoarding Them.” This document is currently publicly available at



<https://web.archive.org/web/20220323052014/https://www.nytimes.com/2020/03/13/business/masks-china-coronavirus.html>.

31. Attached to this affidavit, as Exhibit 30, is a true and accurate copy of an article from The Proceedings of the National Academy of Sciences Journal titled “A call for an independent inquiry into the origin of the SARS-CoV-2 virus.”

32. Attached to this affidavit, as Exhibit 31, is a true and accurate copy of an article from the Nature Journal titled “Engineered bat virus stirs debate over risky research.” This document is currently publicly available at <https://www.nature.com/articles/nature.2015.18787>.

33. Attached to this affidavit, as Exhibit 32, is a true and accurate copy of an article from News in Focus titled “Inside China’s pathogen lab.” This document is currently publicly available at <https://www.nature.com/articles/nature.2017.21487>.

34. Attached to this affidavit, as Exhibit 33, is a true and accurate copy of an article from Daily Mail titled “Is ‘Patient Su’ Covid’s Patient Zero?” This document is currently publicly available at <https://web.archive.org/web/20220224022911/https://www.dailymail.co.uk/news/article-9632921/Is-Patient-Su-Covids-Patient-Zero-asks-IAN-BIRRELL.html>.

35. Attached to this affidavit, as Exhibit 34, is a true and accurate copy of an article published by the MIT Technology Review Journal titled “Inside the risky bat-virus engineering that links America to Wuhan.” This document is currently publicly available at <https://www.technologyreview.com/2021/06/29/1027290/gain-of-function-risky-bat-virus-engineering-links-america-to-wuhan/>.

36. Attached to this affidavit, as Exhibit 35, is a true and accurate copy of an article published by the Bulletin of the Atomic Scientists titled “The origin of COVID: Did people or



nature open Pandora's box at Wuhan?" This document is currently publicly available at <https://thebulletin.org/2021/05/the-origin-of-covid-did-people-or-nature-open-pandoras-box-at-wuhan/>.

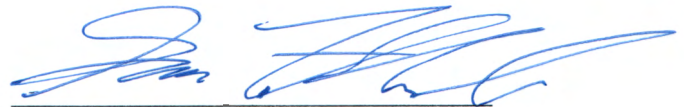
37. Attached to this affidavit, as Exhibit 36, is a true and accurate copy of a government report published by the Missouri Department of Health and Senior Services titled "COVID-19 Impact Summary." This document is currently publicly available at <https://health.mo.gov/living/healthcondiseases/communicable/novel-coronavirus/pdf/impact-summary-2020.pdf>

38. Attached to this affidavit, as Exhibit 37, is a true and accurate copy of a government statement published by the Administrator of the Office of Emergency Coordination in the Missouri Department of Health and Senior Services.

39. Attached to this affidavit, as Exhibit 38, is a true and accurate copy of a report published by the Missouri Hospital Association titled "COVID-19 Situational Awareness Update, April 28, 2020." This document is currently publicly available at <https://abc17news.b-cdn.net/abc17news.com/2020/04/MHA-report-4-28.pdf>

FURTHER AFFIANT SAYETH NAUGHT.

Executed: December 2, 2024

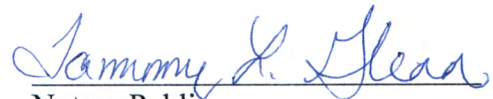
  
Samuel C. Freedlund

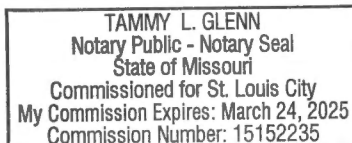
ATTESTATION

State of Missouri )  
County/City of St. Louis, ) ss

Before me, the undersigned authority, personally appeared Samuel C. Freedlund, who hereby swears on his oath or hereby affirms that the foregoing statements in his Affidavit are true and complete to the best of his knowledge, information and belief.

Subscribed and sworn to before me this 2nd day of December, 2024.

  
Notary Public



My commission expires: \_\_\_\_\_

**CERTIFICATE OF SERVICE**

I hereby certify that on December 2, 2024, a true and accurate copy of the foregoing was electronically filed by using the Court's CM/ECF system to be served on all counsel of record entered in the case.

/s/ Samuel C. Freedlund